

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

PROXENSE, LLC

Plaintiff,

v.

TARGET CORPORATION,

Defendant.

Case No. 6:20-cv-00879-ADA

JURY TRIAL DEMANDED

**JOINT MOTION TO EXTEND STAY OF PROCEEDINGS PENDING COMPLETION
OF SETTLEMENT AGREEMENT**

Plaintiff Proxense LLC and Defendant Target Corporation (collectively “the Parties”) respectfully move this Court to extend the stay in proceedings up to and including 14 days, until March 24, 2022.

The Parties have and continue to negotiate the terms of a final written agreement. The Parties respectfully request that this Court extend the stay in the proceedings for an additional 14 days to allow the Parties to finalize and execute a written agreement. The Parties anticipate that a written agreement will be finalized and executed within the requested extension, after which the Parties will promptly file a joint dismissal.

Dated: March 10, 2022

Respectfully submitted,

Counsel for Plaintiff Proxense, LLC

Counsel for Defendant Target Corporation

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CERTIFICATE OF SERVICE

This is to certify on March 10, 2022, that a true and correct copy of the foregoing document has been served upon all counsel of record via the Court's ECF system to counsel of record.

/s/ Matthew S. Yungwirth
Matthew S. Yungwirth